

Motion Granted.
Counsel shall become familiar
with the ACTL Code of Conduct.

/s/ Jack Zouhary
U.S. DISTRICT JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

THEODORE R. BANKS,

Plaintiff,

v.

AMERICAN HERITAGE LIFE
INSURANCE COMPANY aka and/or
dba ALLSTATE WORKPLACE
DIVISION,

Defendant.

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Civil Action No. 3:13-cv-02454-JZ

DEFENDANT'S MOTION FOR *PRO HAC VICE*
ADMISSION OF LANCE V. CLACK

Defendant, American Heritage Life Insurance Company, by and through its Ohio counsel, Hahn, Loeser & Parks, LLP, hereby moves this Court for permission to allow Lance V. Clack of the law firm of Figari & Davenport, LLP of Dallas, Texas to appear and participate in the above-captioned case for purposes of representing Defendant.

Mr. Clack is a member in good standing of the State Bar of Texas, the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas, the United States Bankruptcy Court for the Northern District of Texas, and the United States Court of Appeals for the Fifth Circuit. Mr. Clack was admitted to the State Bar of Texas in 2003. His Certificate of Good Standing for the United States District Court for the Northern District of Texas is attached hereto as "Exhibit "A." Mr. Clack has never been disbarred, suspended from practice, or reprimanded by any court, department, bureau, or commission of any State or the United States.

Moreover, Mr. Clack will be working with Defendant's Ohio counsel, Hahn, Loeser & Parks, throughout the pendency of this matter. Defendant further requests that Mr. Clack be added to the Court's electronic filing system, and, to that end, provides Mr. Clack's information as follows:

Lance V. Clack (Texas Bar No. 24040694)
FIGARI & DAVENPORT, LLP
901 Main St., Suite 3400
Dallas, Texas 75202
214-939-2000
214-939-2090 (fax)
lance.clack@figdav.com

Mr. Clack's \$120.00 admission fee is being submitted to this Court contemporaneously with the filing of this Motion.

Dated: November 19, 2013

Respectfully submitted,

By: /s/ Derek E. Diaz

Derek E. Diaz (0069755)

ddiaz@hahnlaw.com

HAHN, LOESER & PARKS, LLP

200 Public Square, Suite 2800

Cleveland, OH 44114

Telephone: (216) 621-0150

Facsimile: (216) 241-2824

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on the parties listed below on November 19, 2013.

Via ECF:

Francis J. Landry
WASSERMAN, BRYAN, LANDRY & HONOLD, LLP
300 Inns of Court Building
405 N. Huron Street
Toledo, OH 43604

/s/ Derek E. Diaz

Derek E. Diaz

**U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

CERTIFICATE OF GOOD STANDING

I, Karen Mitchell, Clerk of the U.S. District Court for the Northern District of Texas, certify that the attorney named below is admitted to practice before this court and is currently in good standing:

LANCE V. CLACK

Bar Number:

Date of Admission:

24040694

11/24/2003

Witness my official signature and the seal of this court.

Dated: November 18, 2013

Karen Mitchell,
Clerk of Court

By: Elodia Brito
Deputy Clerk

